



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

November 22, 2023

**BY ECF**

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**APPLICATION GRANTED  
SO ORDERED Vern S. Broderick**  
**VERNON S. BRODERICK**  
**U.S.D.J. 11/22/2023**

**Re:        *United States v. Ramirez-Rodriguez, 23 Cr. 363 (VSB)***

Dear Judge Broderick:

The Government writes with respect to defendant Lepido Ramirez-Rodriguez's motion to dismiss the Indictment. *See* Dkt. Nos. 14-15. The Government's response is currently due on November 27, 2023.

The Government respectfully requests that its deadline to respond to the defendant's motion be extended by four days, to December 1, 2023. The Government is requesting this brief extension to further consider and internally consult regarding the arguments that the defendant raises, some of which are currently before the Second Circuit. *See United States v. Raul Gutierrez-Campos*, No. 22-438 (2d Cir.). The parties have discussed this proposed modification to the briefing schedule, and defense counsel consents to the request. The requested modification does not affect the dates for the defendant's reply, due December 8, 2023, or the status conference scheduled for December 20, 2023.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By:

  
Jerry J. Fang  
Assistant United States Attorney  
Southern District of New York  
(212) 637-2584  
Jerry.Fang@usdoj.gov

Cc: Kristoff Williams, Esq. (by ECF)